

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,)
Plaintiff,)
No. 1:18-cr-167-05
-v-)
Honorable Paul L. Maloney
RYAN RASHAD BROWN,)
Defendant.)

ORDER DENYING RENEWED MOTION FOR JUDGMENT OF ACQUITTAL

On November 5, 2019, a jury found Defendant Ryan Brown guilty on all three of the charges. Brown filed a renewed motion for judgment of acquittal on November 19. (ECF No. 994.)

Rule 29(c) of the Federal Rules of Criminal Procedure authorizes a defendant to file a renewed motion for judgment of acquittal within 14 days after guilty verdict. Rule 29 motions, whether made at the close of the government's case, at the close of all the evidence, after the court has discharged the jury, or on appeal, are governed by a single standard: whether the evidence is sufficient to sustain a conviction 2A Charles Alan Wright, *Federal Practice and Procedure*, § 467 (4th Ed. 2009). “[T]he relevant question is whether, after viewing the evidence in the light most favorable to the prosecution, *any* rational trier of fact could have found the essential elements of the crime beyond a reasonable doubt.” *United States v. Osborne*, 886 F.3d 604, 608 (6th Cir. 2018) (emphasis in original) (quoting *Jackson v. Virginia*, 443 U.S. 307, 319 (1979)). For the motion, the court draws all reasonable

inferences and resolutions of credibility in favor of the jury's decision. *Id.* (quoting *United States v. Tragas*, 727 F.3d 610, 617 (6th Cir. 2013)).

The evidence presented at trial against Brown adequately supports the jury's guilty verdict. While the Court appreciates the succinctness of the motion and brief, the brevity of Brown's discussion of the evidence against him fails to meet the heavy burden with which he is tasked. The Government introduced evidence that was more than sufficient for a trier of fact to find Brown guilty on each of the three counts. Having presided over the eight-day trial, the Court is familiar with the evidence presented by the Government, which is accurately summarized in its response brief. (ECF No. 1044.) Viewing the evidence in the Government's favor, as this Court must, Brown is not entitled to the relief he seeks.

Accordingly, Brown's renewed motion for judgment of acquittal (ECF No. 944) is **DENIED. IT IS SO ORDERED.**

Date: December 20, 2019

/s/ Paul L. Maloney
Paul L. Maloney
United States District Judge